

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 26, 2013

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a DC Capital STARS Gala Celebration on March 26, 2013

On March 26, 2013, DC Capital Stars, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a Gala John F. Kennedy Center for the Performing Arts at 7 PM.

The Gala will be widely attended by Members of Congress, State and local officials, NASA personnel, members of the public and the media. Approximately 1,100 people are invited to attend. The estimated value of the event, which includes all food, beverages and entertainment, is \$130.00 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the event.

Accordingly, NASA employees – including non-career appointees required to sign the ethics pledge under Executive Order 13490 – who have been invited to attend may accept free attendance at the event.

NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone